

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI
JACKSON DIVISION**

**JOHN ROBERT SMITH, SHIRLEY HALL
AND GENE WALKER**

PLAINTIFFS

VS.

Civil Action No. 3:01-cv-855-HTW-DCB

**DELBERT HOSEMAN, Secretary of State of
Mississippi; JIM HOOD, Attorney General for the State of
Mississippi; HALEY BARBOUR,
Governor of the State of Mississippi; MISSISSIPPI
REPUBLICAN EXECUTIVE COMMITTEE; and
MISSISSIPPI DEMOCRATIC EXECUTIVE
COMMITTEE**

DEFENDANTS

And

**BEATRICE BRANCH, RIMS BARBER,
L.C. DORSEY, DAVID RULE,
JAMES WOODWARD, JOSEPH P. HUDSON,
and ROBERT NORVEL
INTERVENORS**

CONSOLIDATED WITH

KELVIN BUCK, ET AL.

PLAINTIFFS

VS.

Civil Action No. 3:11-cv-717-HTW-LRA

HALEY BARBOUR, ET AL.

DEFENDANTS

**MOTION OF SAMUEL L. BEGLEY, ESQ. (MS BAR NO. 2315) TO WITHDRAW AS
COUNSEL OF RECORD FOR DEFENDANT MISSISSIPPI
DEMOCRATIC EXECUTIVE COMMITTEE**

Samuel L. Begley, Esq. (MS Bar No. 2315) moves the Court to enter an order formally releasing him as counsel of record for the Defendant Mississippi Democratic Executive Committee, in accordance with L.U.Civ.R 83(1)(b)(3). All parties are being noticed of this

motion through CM/ECF, which sent notification of this filing to their counsel of record. Mr. Begley's client, Mississippi Democratic Executive Committee, is being noticed by an email sent to its chairman, Tyree Irving, and its executive director, Anitra Eubanks. Chairman Irving is also being notified of this motion by cellular telephone text message transmitted to him by Mr. Begley.

Mr. Begley is providing Judge Wingate a proposed order granting this motion to withdraw via the email address for his chambers, and is transmitting this email to all counsel of record and the client's representatives.

Mr. Begley submits that he entered his appearance in the *Smith* case on November 29, 2011 [Docket 107] and in the *Buck* case on the same date [Docket 3], which was more than 10 years ago. The matters pending before the Court today raises entirely new issues, as stated in the Republican Party's motion to declare the 2022 Congressional plan redistricting constitutional, and as stated in the *Buck* Plaintiffs response, in which they seek a trial to determine whether the 2022 redistricting plan is constitutional or violates Section 2 of the Voting Rights Act. Mr. Begley does not wish to represent the Mississippi Democratic Executive Committee in this new litigation between the Republican Party and the *Buck* plaintiffs.

Both Chairman Irving and Ms. Eubanks, the executive director, are practicing members of the Mississippi Bar and have the sophistication to address the Republican Party's motion and the position of the *Buck* plaintiffs.

Accordingly, Mr. Begley respectfully requests the Court enter an order releasing him as counsel for Defendant Mississippi Democratic Executive Committee.

Respectfully Submitted, this the 18th day of February, 2022.

/s/ Samuel L. Begley, Esq.

SAMUEL L. BEGLEY, ESQ.

Counsel of record for Defendant
Mississippi Democratic Executive
Committee

CERTIFICATE OF SERVICE

I, Samuel L. Begley, Counsel of record for Defendant Mississippi Democratic Executive Committee, do hereby certify that I have this date filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record with CM/ECF.

I further certify that I sent notification of such filing to the following persons via email:

Tyree Irving, Chairman
tirving@mississippidemocrats.org

Anitra Eubanks, Executive Director
aeubanks@mississippidemocrats.org

Mississippi Democratic Party
811 E. River Pl. Ste 102
Jackson MS 39202

This the 18th day of February, 2022.

/s/ Samuel L. Begley, Esq.
SAMUEL L. BEGLEY, ESQ.